In the Matter of	)	
	)	
New Part 4 of the Commission's	)	ET Docket No. 04-35
Rules Concerning Disruption	)	
to Communications	)	
	)	

Comments of the QuEST Forum

The Quality Excellence for Suppliers of Telecommunications Forum ("QuEST Forum"), submits the following comments in response to the Notice of Proposed Rulemaking released in the above-captioned proceeding.[1] The QuEST Forum is a worldwide association of telecommunications suppliers and network operators (service providers) with the primary objective being to improve the quality of products and services to customers.

Over the past six years, members of the Forum have established a set of common quality system requirements and measurements designed specifically for the telecommunications industry, building on and including ISO 9001:2000 and telecommunications industry best practices to create a quality management system designed specifically for telecommunications. These requirements and measurements are documented in the TL 9000 Quality Management System Requirements Handbook and the TL 9000 Quality Management System Measurements Handbook. The combination is

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[1] *New Part 4 of the Commission's Rules Concerning Disruption to Communications,* ET Docket No. 04-35, et al, Notice of Proposed Rulemaking, FCC 04-30 (rel. Feb. 23, 2004) ("NPRM").

known as TL 9000. The objective of TL 9000 is to improve service to customers, enhance customer-supplier relationships, and standardize requirements and measurements.

One of the foundations of TL 9000 has been the reporting of telecommunications outages to a central database that is used to calculate industry average, best and worst in class values for each quality measurement by specific product type[2]. There are currently over 550 telecommunications industry participants and the number of participants is doubling yearly. Each participating organization has access to the central database, and can use these industry statistics to improve customer service by gauging product performance against data which tracks industry best, average, and worst. This enables continuous improvement in the industry.

The measurements collected in the TL 9000 database includes problem report rates, response performance to those problem reports, outage data in terms of service impact from the perspective of the end user and in terms of impact on the network element itself, hardware return rates, software maintenance performance and service performance. Where appropriate, these measurements are normalized to the number of systems or lines deployed in order to ensure the comparability of the data being reported across a given product type.

Obviously, there was a great deal of concern about the confidentiality and security of data being collected when the central database was being developed. To ensure that no

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[2] Product types are identified in TL9000 Quality Management System Measurement Handbook

data would be compromised, the University of Texas at Dallas (UTD) was selected to design and implement a highly secure data collection and storage system for the QuEST Forum. The resulting system has been audited and certified as meeting the stringent information security requirements of international standard BS-7799 and in five years of operation has never had an instance where data was compromised or lost.

The QuEST Forum urges the Commission to consider allowing the QuEST Forum to work with the FCC to define appropriate measurements, collection facilities, and reporting procedures to extend QuEST Forum's current extensive data collection system of telecommunication measurements. There is a natural synergy due to the commonality in both the types of data being collected and the need for security of the database between QuEST Forum's TL 9000 database system and the FCC outage reporting database. As we see it, there are major benefits that could be gained by having a single repository: 1) common user interface, 2) data security levels that meet international standards, 3) standard data input fields, 3) automatic notification to the FCC of outages that meet reporting criteria thresholds, 4) automatic notification to other federal agencies (DHS) and state agencies (PSC & PUC) of outages, 5) automatic notification to the supplier(s) involved, 6) consistent data which can be analyzed by authorized agents, 7) standard or ad hoc reports generated as required, and 8) minimum time to develop and implement the appropriate user interface and associated security levels.

CONCLUSION

It is QuEST Forum's direction and desire to work with regulatory bodies around the world to implement common reporting requirements and establish key measurements that

will improve the reliability of the networks and customer satisfaction worldwide. For the

foregoing reasons, the QuEST Forum urges the FCC to consider teaming with the QuEST

Forum to establish the measurements, reporting procedures, and database to provide the

FCC reporting requirements. We would like to discuss this proposal with the appropriate

FCC individuals.

Respectfully submitted,

<u>/s/ Don Pickens</u>

Don Pickens
QuEST Forum
Chief Operating Officer
4526 Peachtree Dunwoody Road, NE
Atlanta GA 30342
Phone - (404) 233-9423